

WLR COST IMPACT SUMMARY FOR THE NPDES PHASE I MUNICIPAL STORMWATER PERMIT FINAL DRAFT

A new National Pollutant Discharge Elimination System (NPDES) permit for regulating municipal stormwater discharges will become effective in 2007. This federal permit, required by the Clean Water Act and administered by the state Department of Ecology (DOE), regulates how municipalities manage stormwater to reduce the discharge of pollutants to the maximum extent practicable. The permit has a 5-year term and specifies the minimum required program elements and outcomes that must be achieved by a municipality's Stormwater Management Program (SWMP). Failure to comply with the permit's requirements exposes a municipality to fines of up to \$50K per day of violation, which is enforceable by DOE or through private citizen lawsuits.

REQUIRED NEW TASK OR PROGRAM EXPANSION		2007 INCREASE (above base)		AVERAGE OUT-YEAR INCREASE		ADDITIONAL DESCRIPTION
		FTE	Cost	FTE/Yr	Cost/Yr	
1	Document new SWMP	0.92	\$91,730	0.08	\$9,736	Documentation of the County's Stormwater Management Program (SWMP) for compliance with the permit must be submitted to DOE in early 2008. Staff input from across the WLR division and other affected divisions is needed to develop and document the County's SWMP.
2	New mapping tasks - Map drainage areas to 24"+ outfalls - Map drainage areas infiltrated	0.58	\$51,659	0.46	\$45,105	Permit requires this mapping to support detection of illicit connections (i.e., discharges other than stormwater to KC's drainage system) and identification of groundwater inputs. 2007 increase may be deferred and addressed in next 3 years of the permit term.
3	Increased coordination	0.25	\$24,794	0.18	\$19,644	Permit requires documentation of procedures for internal and external coordination related to permit compliance. Annual coordination is expected to increase due to more KC departments affected and more local jurisdictions regulated by the permit.
4	Proactive source control in addition to existing "reactive" source control	0.36	\$35,567	4.59	\$478,838	Permit requires site audits of all business activities every 5 years to enforce required best management practices for preventing pollution. Currently, audits only occur when there is a water quality complaint.
5	Update KCC 9.12 to prohibit: - Residential car wash discharges - Lawn watering discharges	0.25	\$25,000	0.00	\$0	Permit requires these prohibitions be adopted in code. Action may be deferrable depending on final permit language and County's willingness to risk non-compliance with this requirement.
6	Illicit connection screening	0.25	\$35,324	1.47	\$153,585	Permit requires field reconnaissance and sampling of County drainage system discharges to identify and locate illicit connections (i.e., discharges other than stormwater). 2007 increase may be deferred and addressed in next 3 years of the permit term.
7	Increased retrofit projects to repair function-impaired stormwater facilities	0.54	\$150,000	0.55	\$138,897	Backlog of 90 function-impaired facility retrofits needs to be eliminated by 2011 to meet permit requirements. 2007 increase may be deferred and addressed in next 3 years of the permit term.
8	SWPPPs for O&M of KC lands/facilities	0.29	\$28,600	0.19	\$20,243	Permit requires that Stormwater Pollution Prevention Practices/Plans (SWPPPs) be developed and implemented for all KC owned facilities and lands to reduce the discharge of pollutants when performing maintenance and operation activities (e.g., exterior cleaning, pesticide use, waste disposal, material storage, soil disturbance, etc.)
9	Training of municipal field staff	0.00	\$0	0.07	\$7,172	Permit requires that all KC field staff be trained in the identification and proper referral of illicit discharges when encountered on the job.
10	Increased public education	3.90	\$404,138	3.17	\$356,921	Staffing proposed to address permit's requirements to (1) increase public awareness of stormwater impacts, natural yard care, pesticide use, hazardous materials, and illicit discharges, (2) increase stewardship activities, and (3) track performance of all KC public education activities. Permit requires increased performance but does not specify how much or what level of effort is needed to achieve it, so staffing may be scalable.
11	New monitoring requirements	1.84	\$155,800	3.14	\$316,331	Staffing proposed to address the permit's new monitoring requirements for stormwater discharges, stormwater program effectiveness, and stormwater BMP effectiveness.
12	New Monitoring lab and material				\$314,117	Lab, Equipment, and Material costs for new monitoring requirements
13	Increased tracking and reporting	0.10	\$9,628	0.10	\$10,883	Increased permit requirements and affected departments will result in increased tracking and reporting of permit compliance.
14	Increased admin/finance/IT/GIS support	0.21	\$17,750	0.21	\$20,060	Increased staffing and work to meet new permit requirements will result in increased need for admin/finance/IT/GIS support.
	TOTALS	9.49	\$1,029,990	14.21	\$1,891,532	
	2007 TOTAL w/highlighted tasks deferred	7.87	\$768,007			